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*Attorneys for Defendant Service Employees  
International Union Local 503*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

TOREY JARRETT, an individual,

Plaintiff,  
v.

MARION COUNTY, a political subdivision  
of the State of Oregon; SERVICE  
EMPLOYEES INTERNATIONAL UNION  
LOCAL 503, a labor organization; and  
MARION COUNTY EMPLOYEES  
ASSOCIATION LOCAL 294, a labor  
organization,

Defendants.

Case No. 6:20-cv-01049-MK

**STIPULATED MOTION TO STAY  
DISCOVERY AND PRETRIAL  
DEADLINES; [PROPOSED] ORDER**

**Pursuant to L.R. 16-3**

**L.R. 7-1 CERTIFICATION**

Pursuant to L.R. 7-1, the undersigned counsel for Defendant SEIU 503 certifies that they have conferred in good faith by email and by telephone with counsel for Plaintiff and Marion County, and Plaintiff and Marion County do not oppose this stipulated motion.

**STIPULATED MOTION TO STAY DISCOVERY  
AND PRETRIAL DEADLINES**

WHEREAS on August 31, 2020, Defendants SEIU 503 and Marion County filed a joint Motion to Dismiss (Doc. 13);

WHEREAS the order the Court will issue on that joint motion will likely shape the future course of this litigation and proceeding with discovery now may result in a waste of party and judicial resources;

THEREFORE, the parties, through their respective counsel of record, hereby stipulate and agree to move this Court to stay all pending discovery and pretrial deadlines pending the Court's ruling on the pending joint motion to dismiss (Doc. 13), except that, by agreement of Plaintiff and Defendant SEIU 503, SEIU 503 will produce the following information to Plaintiff: (1) the metadata from the iPad signature of the membership card that SEIU 503 claims to have on file for Plaintiff, and (2) the identities of the SEIU 503 representatives who SEIU 503's records show obtained the signature in question. Plaintiff will use such information solely for purposes of this action. The parties further stipulate that the Court should set a Rule 16 telephone conference, if needed, following its ruling on the joint motion to dismiss.

IT IS SO STIPULATED.

DATED: September 17, 2020

By: s/ Rebecca C. Lee  
Rebecca C. Lee

SCOTT A. KRONLAND  
REBECCA C. LEE  
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JAMES S. COON  
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*Attorneys for Defendant SEIU 503*

DATED: September 17, 2020

By: s/ Rebekah Millard  
Rebekah Millard

REBEKAH C. MILLARD  
JAMES G. ABERNATHY  
Freedom Foundation

*Attorneys for Plaintiff*

DATED: September 17, 2020

By: s/ Curtis M. Glaccum  
Curtis M. Glaccum

CURTIS M. GLACCUM  
Marion County Legal Counsel

*Attorney for Defendant Marion County*

### **[PROPOSED] ORDER**

Pursuant to the stipulation of the parties, and good cause appearing therefor, the discovery and pretrial deadlines set in this case are hereby stayed pending the Court's ruling on Defendants SEIU 503 and Marion County's joint Motion to Dismiss (Doc. 13), except that SEIU 503 shall provide the following information to Plaintiff: (1) the metadata from the iPad signature of the membership card that SEIU 503 claims to have on file for Plaintiff, and (2) the identities of the SEIU 503 representatives who SEIU 503's records show obtained the signature in question. Plaintiff shall use such information solely for purposes of this action. The Court will set a Rule 16 telephone conference, if needed, following its ruling on the joint motion to dismiss.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

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Mustafa T. Kasubhai  
United States Magistrate Judge